

EXHIBIT 4

1 JENNIFER JEHN
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----X
5 SANDRA GUZMAN,
6 Plaintiff,
7 -against- 09CIV9323 (BSJ) (RLE)
8 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
9 THE NEW YORK POST, and COL ALLAN, in his
10 official and individual capacities,
11 Defendants.
12 -----X
13 AUSTIN FENNER and IKIMULISA LIVINGSTON,
14 Plaintiff,
15 -against- 09CIV9832 (BSJ) (RLE)
16 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
17 THE NEW YORK POST and DAN GREENFIELD and
18 MICHELLE GOTTHELF,
19 Defendants.
20 -----X

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VIDEOTAPED DEPOSITION OF JENNIFER JEHN
New York, New York
Tuesday, June 26, 2012

REPORTED BY: BARBARA R. ZELTMAN
(BOBBIE)
Professional Stenographic Reporter
Job Number: 51052

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<p>1 JENNIFER JEHN</p> <p>2 Q How long have you worked for Dow</p> <p>3 Jones?</p> <p>4 A Over two years.</p> <p>5 Q What's your current position with</p> <p>6 them?</p> <p>7 A I'm the head of circulation.</p> <p>8 Q What does it mean being head of</p> <p>9 circulation; in other words, what are your</p> <p>10 job duties as head of circulation?</p> <p>11 A I'm responsible for acquisition and</p> <p>12 retention and marketing to acquire</p> <p>13 subscriptions to The Wall Street Journal and</p> <p>14 all of the products of The Wall Street</p> <p>15 Journal.</p> <p>16 Q And prior to two years ago, that</p> <p>17 is, prior to coming to The Wall Street</p> <p>18 Journal, what was your employer -- who was</p> <p>19 your employer?</p> <p>20 MR. LERNER: Objection.</p> <p>21 A The New York Post.</p> <p>22 Q And what was your last position at</p> <p>23 The New York Post?</p> <p>24 A I was the Senior Vice President of</p> <p>25 Marketing, Digital Media and Human</p>	<p>1 JENNIFER JEHN</p> <p>2 Resources.</p> <p>3 Q Senior Vice President of Marketing</p> <p>4 and Human Resources.</p> <p>5 Is that one job title or did you</p> <p>6 actually have two job titles?</p> <p>7 MR. LERNER: Objection.</p> <p>8 Go ahead.</p> <p>9 A I was Senior Vice President of</p> <p>10 Marketing, Digital Media and Human</p> <p>11 Resources.</p> <p>12 Q Okay. So that was just one job</p> <p>13 title?</p> <p>14 A Yes.</p> <p>15 Q And how long were you senior vice</p> <p>16 president of Marketing and Human Resources?</p> <p>17 MR. LERNER: Objection.</p> <p>18 Q For the New York Post?</p> <p>19 A Over five years.</p> <p>20 Q So as senior vice president of</p> <p>21 Human Resources, did you basically run the</p> <p>22 Human Resources Department?</p> <p>23 MR. LERNER: Objection.</p> <p>24 You can answer.</p> <p>25 A I was responsible for Human</p>
Page 16	Page 17
<p>1 JENNIFER JEHN</p> <p>2 Resources reporting to me.</p> <p>3 Q Was there anyone in the Human</p> <p>4 Resources Department at The Post that was</p> <p>5 senior to you?</p> <p>6 A No.</p> <p>7 Q So you were the highest-ranking</p> <p>8 human resources executive at The Post?</p> <p>9 A Yes.</p> <p>10 Q And as senior vice president of</p> <p>11 Human Resources, who did you report to?</p> <p>12 A Paul Carlucci.</p> <p>13 Q And who is Paul Carlucci?</p> <p>14 A Paul Carlucci is the publisher of</p> <p>15 the New York Post.</p> <p>16 Q Do you know who Paul Carlucci works</p> <p>17 for?</p> <p>18 MR. LERNER: Objection.</p> <p>19 A I do not.</p> <p>20 Q Have you ever been an employee of</p> <p>21 News Corporation?</p> <p>22 A No.</p> <p>23 Q Who hired you -- actually, other</p> <p>24 than being senior vice president of</p> <p>25 Marketing and Human Resources, did you have</p>	<p>1 JENNIFER JEHN</p> <p>2 any other positions at The New York Post?</p> <p>3 A No.</p> <p>4 Q So you said you were senior vice</p> <p>5 president for about five years. That was</p> <p>6 the entire time that you were at The New</p> <p>7 York Post; is that correct?</p> <p>8 A Yes.</p> <p>9 Q And who hired you to work for The</p> <p>10 New York Post?</p> <p>11 A Paul Carlucci.</p> <p>12 Q And you were never promoted during</p> <p>13 your time at The Post; you were just at the</p> <p>14 same position?</p> <p>15 MR. LERNER: Objection.</p> <p>16 Do you understand the question?</p> <p>17 THE WITNESS: I don't</p> <p>18 understand the question.</p> <p>19 Q Your job title -- was your job</p> <p>20 title the same the entire five years you</p> <p>21 worked for The New York Post?</p> <p>22 A Yes.</p> <p>23 Q So would it be fair to say you were</p> <p>24 never promoted? You came in at a position</p> <p>25 and you left at the same position, correct?</p>

<p style="text-align: right;">Page 34</p> <p>1 JENNIFER JEHN</p> <p>2 MR. LERNER: Objection.</p> <p>3 A I don't know.</p> <p>4 Q Did she work for News America?</p> <p>5 MR. LERNER: Objection.</p> <p>6 A I don't know.</p> <p>7 Q Does Jordan Lippner work for News</p> <p>8 America?</p> <p>9 A I don't know.</p> <p>10 Q Has Jordan Lippner ever told you</p> <p>11 who he works for?</p> <p>12 MR. LERNER: Objection.</p> <p>13 Don't answer that.</p> <p>14 (Directive to witness.)</p> <p>15 MR. LERNER: It's privileged.</p> <p>16 MR. CLARK: Who Jordan Lippner</p> <p>17 works for is privileged?</p> <p>18 Could you explain that one?</p> <p>19 MR. THOMPSON: Let's take a</p> <p>20 moment. Let's call the Court.</p> <p>21 MR. CLARK: Can we go off the</p> <p>22 record.</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 10:50 a.m. Going off the record.</p> <p>25 (A brief recess was</p>	<p style="text-align: right;">Page 35</p> <p>1 JENNIFER JEHN</p> <p>2 taken.)</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 11:00 a.m. We're back on the record.</p> <p>5 MR. LERNER: The witness is</p> <p>6 going to answer the same question</p> <p>7 about Mr. Lippner.</p> <p>8 MR. CLARK: Could you read back</p> <p>9 the last question, please.</p> <p>10 (Requested portion of record read:</p> <p>11 "Q. Has Jordan Lippner ever told</p> <p>12 you who he works for?")</p> <p>13 (End of read-back.)</p> <p>14 A No.</p> <p>15 Q Has Jan Constantine ever told you</p> <p>16 who she worked for in 2009?</p> <p>17 MR. LERNER: Objection.</p> <p>18 A No.</p> <p>19 Q And there were no other lawyers</p> <p>20 that assisted you in learning how to conduct</p> <p>21 an investigation into an allegation of</p> <p>22 employment discrimination?</p> <p>23 MR. LERNER: Objection.</p> <p>24 A I don't recall any others.</p> <p>25 Q You mentioned earlier that you had</p>
<p style="text-align: right;">Page 36</p> <p>1 JENNIFER JEHN</p> <p>2 a number of jobs in HR; is that correct?</p> <p>3 A I worked in HR.</p> <p>4 Q What was the first job you had in</p> <p>5 HR?</p> <p>6 A I worked in HR for News America</p> <p>7 FSI.</p> <p>8 Q And that's News America</p> <p>9 Freestanding Inserts?</p> <p>10 A Yes.</p> <p>11 Q What year did you begin working for</p> <p>12 News America FSI?</p> <p>13 A I don't remember the exact date.</p> <p>14 Q Do you know the year?</p> <p>15 A Around 1994 or '5.</p> <p>16 Q Is News America FSI a subsidiary of</p> <p>17 News Corporation?</p> <p>18 A I don't know.</p> <p>19 Q What was your title at News America</p> <p>20 FSI?</p> <p>21 A I don't remember.</p> <p>22 Q Can you describe any training you</p> <p>23 received while conducting an investigation</p> <p>24 into an allegation of employment</p> <p>25 discrimination while you were at News</p>	<p style="text-align: right;">Page 37</p> <p>1 JENNIFER JEHN</p> <p>2 America FSI?</p> <p>3 MR. LERNER: Objection.</p> <p>4 A I received training and support and</p> <p>5 guidance from our lawyers and employment</p> <p>6 lawyers.</p> <p>7 Q Can you describe what that training</p> <p>8 consisted of?</p> <p>9 MR. LERNER: Objection.</p> <p>10 A I don't recall.</p> <p>11 Q Do you recall the names of any of</p> <p>12 these employment lawyers that helped train</p> <p>13 you at News America FSI?</p> <p>14 A The lawyer would be Jan</p> <p>15 Constantine.</p> <p>16 Q Earlier when you spoke about Jan</p> <p>17 Constantine, were you referring to training</p> <p>18 you received when you were at News America</p> <p>19 FSI?</p> <p>20 MR. LERNER: Objection.</p> <p>21 A Could you repeat that question?</p> <p>22 Q Did Jan Constantine provide you</p> <p>23 training when you were anywhere other than</p> <p>24 during your position at News America FSI?</p> <p>25 MR. LERNER: Objection.</p>

<p style="text-align: right;">Page 38</p> <p>1 JENNIFER JEHN</p> <p>2 A I still don't understand what you</p> <p>3 are asking me.</p> <p>4 Q Did Jan Constantine help to train</p> <p>5 you when you were an employee of The New</p> <p>6 York Post regarding the conducting of an</p> <p>7 investigation of employment discrimination?</p> <p>8 A Could you repeat it again?</p> <p>9 Q Did Jan Constantine help to train</p> <p>10 you in any HR matters when you worked for</p> <p>11 The New York Post?</p> <p>12 A I don't remember.</p> <p>13 Q So Ms. Constantine may have trained</p> <p>14 you both at The New York Post and at News</p> <p>15 America FSI?</p> <p>16 MR. LERNER: Objection.</p> <p>17 A I don't recall.</p> <p>18 Q Were there any other attorneys who</p> <p>19 helped train you in HR matters when you were</p> <p>20 at News America FSI?</p> <p>21 A I don't recall.</p> <p>22 Q Was there anyone else who helped to</p> <p>23 train you in HR when you were at News</p> <p>24 America FSI?</p> <p>25 MR. LERNER: Objection.</p>	<p style="text-align: right;">Page 39</p> <p>1 JENNIFER JEHN</p> <p>2 A I don't recall.</p> <p>3 Q Do you recall any other training</p> <p>4 that you received in how to conduct an</p> <p>5 investigation into an allegation of</p> <p>6 employment discrimination when you were at</p> <p>7 News America FSI?</p> <p>8 MR. LERNER: Objection.</p> <p>9 A I don't recall.</p> <p>10 Q How long were you at News America</p> <p>11 FSI?</p> <p>12 A Could you repeat that question?</p> <p>13 Q How long were you employed by News</p> <p>14 America FSI?</p> <p>15 A I don't remember the specific</p> <p>16 number of years. Around five.</p> <p>17 Q And did you have any HR positions</p> <p>18 other than your position at News America FSI</p> <p>19 and The New York Post?</p> <p>20 A Yes.</p> <p>21 Q What was the next HR position you</p> <p>22 had after News America FSI.</p> <p>23 Strike that last question.</p> <p>24 News America FSI was the first HR</p> <p>25 job you ever had, correct?</p>
<p style="text-align: right;">Page 40</p> <p>1 JENNIFER JEHN</p> <p>2 A Yes.</p> <p>3 Q So after you left News America FSI,</p> <p>4 what was the next HR job you had after that?</p> <p>5 A I had HR responsibilities at</p> <p>6 TV Guide.</p> <p>7 Q What is the name of the corporation</p> <p>8 that owns TV Guide?</p> <p>9 A I don't know.</p> <p>10 Q Are they a subsidiary of News</p> <p>11 Corporation?</p> <p>12 A I do not know.</p> <p>13 Q What was your job title at</p> <p>14 TV Guide?</p> <p>15 A I don't recall.</p> <p>16 Q Describe any training you received</p> <p>17 when you were at TV Guide regarding how to</p> <p>18 conduct an investigation into an allegation</p> <p>19 of employment discrimination.</p> <p>20 MR. LERNER: Objection.</p> <p>21 You can answer.</p> <p>22 A I had training and advice and</p> <p>23 support from employment lawyers and legal</p> <p>24 counsel.</p> <p>25 Q What were the names of the lawyers</p>	<p style="text-align: right;">Page 41</p> <p>1 JENNIFER JEHN</p> <p>2 who gave you this training at TV Guide?</p> <p>3 A I don't remember.</p> <p>4 Q Was Linda Babajko one of them?</p> <p>5 I'm sorry. Strike that.</p> <p>6 Was Jan Constantine one of them?</p> <p>7 A Yes.</p> <p>8 Q Did Jan Constantine work for</p> <p>9 TV Guide during the time that you worked for</p> <p>10 TV Guide?</p> <p>11 A No.</p> <p>12 Q So why was Jan Constantine giving</p> <p>13 you advice about how to conduct an</p> <p>14 investigation into employment discrimination</p> <p>15 when you were an employee of TV Guide?</p> <p>16 MR. LERNER: Objection.</p> <p>17 A Jan Constantine was a lawyer in</p> <p>18 employment who was a resource available to</p> <p>19 me.</p> <p>20 Q Why was Jan Constantine a resource</p> <p>21 available to you as an employee of TV Guide?</p> <p>22 MR. LERNER: Objection.</p> <p>23 A She was a resource available to me.</p> <p>24 Q Wasn't she available to you because</p> <p>25 TV Guide is a subsidiary of NewsCorp. and</p>

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<p>1 JENNIFER JEHN</p> <p>2 Jan Constantine works for NewsCorp.?</p> <p>3 MR. LERNER: Objection.</p> <p>4 A You need to repeat that question.</p> <p>5 Please, will you repeat that.</p> <p>6 MR. CLARK: Read it back.</p> <p>7 (Requested portion of record read:</p> <p>8 Q. Wasn't she available to you</p> <p>9 because TV Guide is a subsidiary of</p> <p>10 NewsCorp. and Jan Constantine works for</p> <p>11 NewsCorp.?)</p> <p>12 (End of read-back.)</p> <p>13 MR. LERNER: Objection.</p> <p>14 A No.</p> <p>15 Q What's the basis for you saying no?</p> <p>16 MR. LERNER: Objection.</p> <p>17 A I don't know who Jan Constantine</p> <p>18 works for.</p> <p>19 Q So how can you possibly say she's</p> <p>20 not an employee of NewsCorp.?</p> <p>21 MR. LERNER: Objection.</p> <p>22 A I don't know who Jan Constantine</p> <p>23 worked for.</p> <p>24 Q Isn't it true that when you worked</p> <p>25 for News America FSI, Jan Constantine was a</p>	<p>1 JENNIFER JEHN</p> <p>2 resource available to you because News</p> <p>3 America FSI is a subsidiary of NewsCorp. and</p> <p>4 Jan Constantine works for NewsCorp.?</p> <p>5 MR. LERNER: Objection.</p> <p>6 A That's not true.</p> <p>7 Q What's your basis for saying it's</p> <p>8 not true?</p> <p>9 A I don't know who Jan Constantine</p> <p>10 works for.</p> <p>11 Q So what's your basis for saying</p> <p>12 it's not true?</p> <p>13 A I don't know who Jan Constantine</p> <p>14 works for.</p> <p>15 Q After TV Guide, did you have any</p> <p>16 other HR jobs other than New York Post?</p> <p>17 A I don't recall.</p> <p>18 Q What year did you -- what was your</p> <p>19 last year that you worked for TV Guide?</p> <p>20 A I don't remember the exact year.</p> <p>21 Q You don't recall if you worked --</p> <p>22 had any employment between TV Guide and The</p> <p>23 New York Post?</p> <p>24 A I was employed between TV Guide and</p> <p>25 The New York Post, yes.</p>
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<p>1 JENNIFER JEHN</p> <p>2 Q So you don't recall if any of those</p> <p>3 jobs involved HR?</p> <p>4 A I don't recall.</p> <p>5 Q Who did you work for directly after</p> <p>6 you left TV Guide?</p> <p>7 A News America Marketing.</p> <p>8 Q Is News America Marketing a</p> <p>9 subsidiary of NewsCorp.?</p> <p>10 MR. LERNER: Objection.</p> <p>11 A I don't know.</p> <p>12 Q Did you work for anyone between</p> <p>13 News America Marketing and The New York</p> <p>14 Post?</p> <p>15 A Yes.</p> <p>16 Q Who did you work for directly after</p> <p>17 News America Marketing?</p> <p>18 A Liquidmetal Technologies.</p> <p>19 Q Where are they located?</p> <p>20 A At the time, Tampa Florida.</p> <p>21 Q And did your job with Liquidmetal</p> <p>22 involve human resources?</p> <p>23 A No.</p> <p>24 Q Did you work for anyone else</p> <p>25 between Liquidmetal and The New York Post?</p>	<p>1 JENNIFER JEHN</p> <p>2 A Yes.</p> <p>3 Q What was your next job after</p> <p>4 Liquidmetal?</p> <p>5 A Fortress Technologies.</p> <p>6 Q And did that job involve human</p> <p>7 resources?</p> <p>8 A No.</p> <p>9 Q Who did you work for directly after</p> <p>10 Fortress Technologies?</p> <p>11 A The New York Post.</p> <p>12 Q At any of your HR positions, did</p> <p>13 you ever receive training with respect to</p> <p>14 how to conduct an investigation with respect</p> <p>15 to sexual harassment in the workplace?</p> <p>16 MR. LERNER: Objection.</p> <p>17 A Could you repeat that question?</p> <p>18 MR. CLARK: Could you read it</p> <p>19 back, please.</p> <p>20 (Requested portion of record read:</p> <p>21 "Q. At any of your HR positions,</p> <p>22 did you ever receive training with</p> <p>23 respect to how to conduct an</p> <p>24 investigation with respect to sexual</p> <p>25 harassment in the workplace?")</p>

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<p>1 JENNIFER JEHN</p> <p>2 "Q. What other ways would be a way</p> <p>3 to retaliate against an employee other</p> <p>4 than losing their job?")</p> <p>5 (End of read-back.)</p> <p>6 A If an employee had responsibilities</p> <p>7 taken away from them because they filed a</p> <p>8 complaint against their supervisor.</p> <p>9 Q Any other ways?</p> <p>10 MR. LERNER: Objection.</p> <p>11 A I don't remember.</p> <p>12 Q When you were head of HR in 2009,</p> <p>13 were employees advised about how to file a</p> <p>14 complaint of harassment or discrimination?</p> <p>15 MR. LERNER: Objection.</p> <p>16 You can answer if you understand</p> <p>17 the question.</p> <p>18 A Employees were advised that they</p> <p>19 can make a complaint to New York Post Human</p> <p>20 Resources, they can complain to their</p> <p>21 manager, they can report it to an alert</p> <p>22 line.</p> <p>23 Q What is Alert Line?</p> <p>24 A An alert line is made available to</p> <p>25 New York Post employees that they can file a</p>	<p>1 JENNIFER JEHN</p> <p>2 complaint or grievance.</p> <p>3 Q Who runs this alert line that New</p> <p>4 York Post employees can call to complain</p> <p>5 about a complaint?</p> <p>6 MR. LERNER: Objection.</p> <p>7 Q To complain about a grievance.</p> <p>8 A I don't know who runs it.</p> <p>9 Q Does The New York Post run it?</p> <p>10 MR. LERNER: Objection.</p> <p>11 A I don't know.</p> <p>12 Q Is there one alert line for all of</p> <p>13 the NewsCorp. subsidiaries?</p> <p>14 A I don't know.</p> <p>15 Q From what you described, are there</p> <p>16 any other ways that an employee can complain</p> <p>17 about employment discrimination?</p> <p>18 A An employee can complain to their</p> <p>19 manager, to Human Resources, anyone in Human</p> <p>20 Resources, and to the alert line.</p> <p>21 Q Could an employee of The New York</p> <p>22 Post complain to an attorney?</p> <p>23 A Employees at The New York Post can</p> <p>24 complain to HR, their manager, the alert</p> <p>25 line. That's who they know they can</p>
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<p>1 JENNIFER JEHN</p> <p>2 complain to.</p> <p>3 Q Suppose an employee of The New York</p> <p>4 Post wanted to make a complaint to Jordan</p> <p>5 Lippner? Would that be acceptable, in your</p> <p>6 experience as head of HR for The New York</p> <p>7 Post?</p> <p>8 MR. LERNER: Objection.</p> <p>9 Do you understand the question?</p> <p>10 THE WITNESS: Actually, I don't</p> <p>11 understand the question.</p> <p>12 BY MR. CLARK:</p> <p>13 Q Would it be an acceptable way to</p> <p>14 complain about employment discrimination for</p> <p>15 an employee of The New York Post to complain</p> <p>16 to Jordan Lippner?</p> <p>17 MR. LERNER: Objection.</p> <p>18 A New York Post employees can</p> <p>19 complain to HR, their manager, an alert</p> <p>20 line. That's who they can complain to.</p> <p>21 Q So your answer is no, it would</p> <p>22 not -- complaining to Jordan Lippner would</p> <p>23 not be an acceptable way in your view to</p> <p>24 make a complaint about employment</p> <p>25 discrimination as an employee of The New</p>	<p>1 JENNIFER JEHN</p> <p>2 York Post?</p> <p>3 MR. LERNER: Objection.</p> <p>4 A Can you repeat the question?</p> <p>5 MR. CLARK: Could you read it</p> <p>6 back?</p> <p>7 (Requested portion of record read:</p> <p>8 "Q. So your answer is no, it would</p> <p>9 not -- complaining to Jordan Lippner</p> <p>10 would not be an acceptable way in your</p> <p>11 view to make a complaint about employment</p> <p>12 discrimination as an employee of The New</p> <p>13 York Post?")</p> <p>14 (End of read-back.)</p> <p>15 A Jordan Lippner, as a resource to</p> <p>16 Human Resources at The New York Post, a New</p> <p>17 York Post employee could make a complaint to</p> <p>18 him.</p> <p>19 Q So it would be an acceptable way to</p> <p>20 make a complaint if you were an employee of</p> <p>21 The New York Post?</p> <p>22 MR. LERNER: Objection. I</p> <p>23 think the issue is the word</p> <p>24 "acceptable."</p> <p>25 I don't know what it means but I</p>

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2 A It was a decision made by consensus
3 by our Executive Committee that the Tempo
4 section was going to be reduced in its
5 frequency, which that decision resulted in
6 the position elimination and that position
7 was the editor's position.

8 Q Who participated in this decision
9 to eliminate Sandra Guzman's position?

10 A The Executive Committee.

11 Q Who does that include?
12 Withdraw that.

13 Was this a decision made at a
14 specific meeting of the Executive Committee?
15 Strike the last question.

16 Who was on the Executive Committee
17 in 2009 when this decision to reduce Tempo
18 was made and to eliminate Sandra Guzman's
19 position?

20 A I don't recall all the members of
21 Executive Committee on that day.

22 Q Who do you recall being on the
23 Executive Committee in 2009?

24 A I recall myself, Col Allan, Paul
25 Carlucci, Michael Racano, Howard Adler, Amy

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1 JENNIFER JEHN

2 eliminated as a result of that.

3 Q So did the Executive Committee
4 decide to eliminate Sandra Guzman's
5 position?

6 A The Executive Committee, yes, did
7 decide to eliminate the position of editor
8 of Tempo.

9 Q Did the Executive Committee decide
10 to lay off Sandra Guzman?

11 A We didn't talk specifically about
12 Sandra Guzman but we decided that the editor
13 position would be eliminated.

14 Q What do you mean "we decided it
15 would be eliminated"? Who are you talking
16 about?

17 A The Executive Committee.

18 Q Did Col Allan have a role in
19 determining to lay off Sandra Guzman?

20 MR. LERNER: Objection.

21 A Yes. He was part of the Executive
22 Committee.

23 Q What did he say at that meeting?

24 A I don't recall.

25 Q What did you say at the meeting?

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1 JENNIFER JEHN

2 Scaldone, Patrick Judge, Chris Shaw.

3 Q Was Les Goodstein on the Executive
4 Committee in 2009?

5 A I don't know if Les Goodstein is a
6 member of the Executive Committee.

7 Q Why do you not know if Les
8 Goodstein is on the Executive Committee?

9 MR. LERNER: Objection.

10 A He participants in Executive
11 Committee. I don't know if he's a member of
12 Executive Committee.

13 Q Was Les Goodstein present at the
14 committee meeting in which it was decided
15 that the frequency of Tempo would be reduced
16 which would result in the elimination of
17 Sandra Guzman's position?

18 A I don't recall if he was present
19 specifically.

20 Q What do you mean that "reducing the
21 frequency of the section would result in the
22 elimination of Sandra Guzman's position"?

23 MR. LERNER: Objection.

24 A The Tempo section was going to be
25 produced less, and the editor's position was

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1 JENNIFER JEHN

2 A I don't recall.

3 Q Do you recall Paul Carlucci saying
4 anything?

5 A I don't recall what he said.

6 Q Do you recall anything said by
7 anyone at that meeting with respect to Tempo
8 and Sandra Guzman?

9 MR. LERNER: Objection.

10 A I recall that we agreed that the
11 Tempo section was going to be reduced and
12 then that would result in the Tempo editor
13 position being eliminated.

14 Q When you say the Tempo section and
15 the editor of Tempo being eliminated, does
16 that necessarily mean that Sandra Guzman
17 would be laid off?

18 MR. LERNER: Objection.

19 A That means that the position of the
20 Tempo editor would have been eliminated.
21 There are options when you have those
22 discussions.

23 We decided that the position, the
24 Tempo position, editor position, was going
25 to be eliminated.